AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

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☐ Duplicate Original

Hon. Jacqueline Chooljian, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT

	for the	FILED CLERK, U.S. DISTRICT COURT June 8, 2025			
Central D	istrict of California				
United States of America,		CENTRAL DISTRICT OF CALIFORNIA BY:CLD			
v.					
KADE WILDE BYRAND,	Case No. 2:25-MJ-03505-DUTY				
Defendants.					
CRIMINAL COMPLAINT BY TELEPHONE					

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, Abbas Charkhabi, the complainant in this case, state that the following is true to the best of my

knowledge and belief. On or about the date of June 6, 2025, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

Offense Description

18 U.S.C. § 111 **Assault on a Federal Officer**

This criminal complaint is based on these facts:

Please see attached affidavit.

Description

Assault on a Federal Officer*

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Please see attached affidavit.

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Assault on a Federal Officer*

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Please see attached affidavit.

Description

**Assault on a Federal Officer*

**This criminal complaint is based on these facts:

Please see attached affidavit.

Description

Abas Charkhabi, Special Agent

Printed name and title

Printed name and title

**Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

**June 8, 2025 at 12:53 p.m.*

**June 8, 2025 at 12:53 p.m

AUSA: Max Shapiro x7419

City and state: Los Angeles, California

AFFIDAVIT

I, Abbas Charkhabi, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

- This affidavit is made in support of a criminal complaint and arrest warrant against Kade Wilde Byrand ("BYRAND") for a violation of 18 U.S.C. § 111(a)(1) (Assault on a Federal Officer).
- 2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and have been so employed since April 2023. I received basic law enforcement training at the FBI Academy in Quantico, Virginia from April 2023 to August 2023. This training included segments on criminal law, various law enforcement skills, conducting criminal investigations, and other law enforcement topics.

- 4. From approximately September 2023 to March 2025, I was assigned to the Los Angeles Joint Terrorism Task Force, a multiagency task force led by the FBI, which includes the Los Angeles Police Department, the Los Angeles County Sheriff's Department, Homeland Security Investigations and other organizations. On this task force, I focused on investigation of Sunni Extremism Terrorist activity and support, such as Islamic State of Isis and Syria and Al-Qaeda.
- 5. Since March 2025, I have been assigned to the Los Angeles Metropolitan Violent Crime Task Force. During my time with the Los Angeles Metropolitan Violent Crime Task Force, I have participated in multiple investigations of large-scale street gangs and criminal enterprises.

III. STATEMENT OF PROBABLE CAUSE

6. Based on my conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Background

- 7. On June 6, 2025, multiple federal law enforcement agencies coordinated several immigration-related enforcement actions across the Los Angeles, California area. In response, protestors gathered in different areas of the city.
- 8. One protest occurred at the BOP's Metropolitan

 Detention Center ("MDC-LA") located at 535 North Alameda Street,

 Los Angeles, CA 90012, where detainees from the immigration

 actions were being held. Hundreds of protestors gathered at

 MDC-LA to protest.

9. During the course of the protest, protestors slowly advanced up the steps of MDC-LA towards the BOP officers that were attempting to defend the inmates and prevent protesters from entering the building. The Los Angeles Police Department and FBI Los Angeles Special Weapons and Tactics team were deployed to deter the protestors from entering into the federal buildings.

B. Assault

- 10. In the afternoon of June 6, 2025, BYRAND and his fiancé, J.C., attended a protest occurring outside MDC-LA. While there, BYRAND shouted at K.N., a BOP Correctional Systems Officer. BYRAND then grabbed K.N.'s vest and physically shoved K.N. K.N. and other BOP officers took BYRAND to the ground and restrained BYRAND.
- 11. At approximately 8:30 P.M., BOP officials notified the FBI that there was a protestor that had been detained for assaulting a BOP officer outside MDC-LA. Due to the ongoing protests, FBI was not able to respond immediately.

C. FBI interview of K.N.

- 12. I spoke with other FBI SAs who provided the following information regarding K.N.'s interview with them regarding the incident:
- 13. Per their standard protocol for large protests, BOP began to fortify the MDC-LA building by having inmates board up the outside of the windows near the entrance of the building, in anticipation of a protest. The BOP staff, including K.N., stood outside and guarded the inmates from the protestors and

prevented the inmates from escaping. K.N. was wearing his agency tactical soft vest with a law enforcement badge patch on the left side of his chest. As a group of 200-300 protestors approached the entrance at MDC-LA, BOP staff escorted the inmates inside. The protestors slowly approached the stairs that led to the door that K.N. and other BOP officers were guarding. The BOP officers shouted "GET BACK" to the crowd of protestors, who continued advancing towards the BOP officers.

- 14. K.N. observed BYRAND initially near the middle of the crowd. He was shaking and yelling "FUCKING FASCISTS" at the BOP guards. Then, when BYRAND was about fifteen feet from K.N., BYRAND ran at K.N., grabbed K.N.'s vest and started to push K.N.
- 15. In response, K.N. grabbed BYRAND's arms and pulled BYRAND to the ground. For about a minute, BYRAND resisted, attempting to flail his arms. BOP officers attempted to gain control of his hands, while giving him verbal commands. K.N. and other BOP officers were eventually able to get BYRAND to comply and to detain him.
 - 16. After being detained, BYRAND apologized to K.N.

D. FBI's Custodial Interview of BYRAND

- 17. On June 6, 2025, another SA and I interviewed BYRAND. We advised BYRAND of his rights per the FBI Advice of Rights FD-395 form. BYRAND stated he understood his rights and voluntarily waived his rights. From the interview, I learned the following:
- a. BYRAND had heard about the immigration protest from BYRAND's boss. The protest was near BYRAND and J.C.'s

residence. BYRAND and J.C. went to a brewery, where BYRAND had one beer, while they waited for the protest to start. BYRAND believes he may have been slightly intoxicated. After the brewery, BYRAND and J.C. walked to the protest.

- b. BYRAND has very strong pro-immigrant views and had intense feelings at the protest. BYRAND did not want J.C. or the other protestors to think BYRAND was a coward and wanted to prove himself to J.C. and other protestors. As a result, BYRAND began to yell at an officer, later identified as K.N. The officer then looked at BYRAND, who was within a few feet of the officer. This caused BYRAND to feel challenged by the officer, but BYRAND did not feel threatened by the officer.
- c. BYRAND then pushed the officer with the intent of creating separation from the officer.
- d. Prior to the push, BYRAND was informed that the victim was an ICE officer. BYRAND was informed, by the Internet and J.C., that the location of the protest was where ICE officers worked and where people who were being detained.

 BYRAND overheard other protestors shout "Fuck you, ICE officers". BYRAND pushed the victim as opposed to other officers because the victim was directly in front of him and made eye contact with BYRAND.
- e. After the incident, BYRAND said that he will not be attending another protest again and will not be consuming alcohol for a long time. BYRAND did not believe it is ok to physically attack anyone, even ICE officers, and that he did not

intend to harm the officer. BYRAND said he apologized and took full responsibility for his actions.

E. BYRAND's Social Media

- 18. Utilizing open sources resources, the FBI identified an account on X (formerly Twitter), @Kbyrandart, that law enforcement believes to be used by BYRAND.
- 19. On June 6, 2025, the X account @Kbyrandart posted the details of the upcoming immigration protest at MDC-LA, encouraging others to join. A screenshot of the post is attached below:



IV. CONCLUSION

20. For all of the reasons described above, there is probable cause to believe that BYRAND has committed a violation of 18 U.S.C. \S 111(a)(1) (Assault on a Federal Officer).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 8th day of June 2025 at 12:53 p.m.

ON. JACQUELINE CHOOLJIAN

UNITED STATES MAGISTRATE JUDGE